

Denise Jones
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November 19, 2022

The Honorable Andrew L. Carter Jr.
United States District Court
Southern District of New York
500 Pearl street, New York, NY 10007

Re: 1:22 cv 00893(ALC)

The plaintiff is respectfully asking the courts to deny the motion to dismiss. The plaintiff also respectfully asks the courts to allow the plaintiff to continue the process to obtain judgment due to default by [law](#) or proceed with the jury trial requested.

First addressing the motion to dismiss,

On February 1, 2022 the plaintiff Denise Jones filed a PRO-SE complaint against Atlantic Records aka (Atlantic Recording Corporation) , Warner Music Group (Warner Music Group corporation) 1501 Certified Entertainment, 300 Entertainment, etc. the complaint was filed 2/2/22. The detailed complaint states in the introduction; The defendants, affiliates, and employees are liable for criminal actions that infringed copyrights and other rights (such as the first amendment) while breaking the Anti- trust Laws.

The detailed complaint states: The defendants are involved in the distortion, mutilation, modifications, manufacture, distribution, sale and other commercial use of; [WAP](#). The song and video by Cardi B real name (Becelis Almanzar) , Megan Thee Stallion real name (Megan J Pete) , and songwriter Padison Fontaine real name Jorden Thorpe, and [THOT SHIT](#) song and video, by Megan Thee Stallion real name (Megan J. Pete) and also songwriter and public industry boyfriend Pardison Fontaine real name [Jorden Thorpe](#). The plaintiff is in good faith that the courts clearly notified the copyright office of the allegations. The defendants disrespected the honor and reputation of Denise Jones with gross negligence, without sampling clearance, no written or verbal permission, nor gave credit to the original author. This brutally hurt the current market value of the works by widely dissemination of a counterfeit Issue of a carefully curated publication.

Section one in the complaint it clearly identifies the subject matter of the complaint as copyright certificates and related works; SR 915-790, SR 908-675, SR 915-790, SR 908-675 and SR 915-276 but not limited to; the complaint clearly notifies the defendants that they are being accused of criminal infringement on audio and visual works created and published by the plaintiff.

The copyright Law of The United States Title 17 chapter 501. Infringement of copyright a. If anyone violates any of the exclusive rights of the copyright owner (b.) legal beneficial owner of an exclusive right under a copyright is entitled and subject to the requirements of section 411 registrations of the copyright claim has been made in accordance with this title certificate of registration satisfies the requirements of section 411 and 412 of the copyright law.

12/8/2019 right before the 2020 election Denise Jones artist name NECEYX, created a full body of work called Generation X. The body of work consists of audio and visuals created

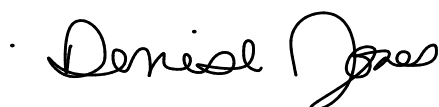
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based on the real life of NECEYX as a community activist and leader. The main song and video the defendants infringed against was a song called [Grab Em By The Pu**y](#). Please (See MP3 version and trailer of GBTP video in attachments labeled 1). The song GBTP describes how powerful the women's role is in politics behind the scenes without discrediting our men. It was in a mild provocative manner to grasp the attention of the fans. The body of art was also curated to exhibit the art of NeceyX's historical events as a community activist, and displayed Denise's personal religious and political views. The Generation X art project has a hidden positive message to women and young ladies. The message was to encourage women to get more active in the system, to value their private parts, and use protection. The art was designed to appeal to everyone. The creative pursana and likeness of the artist is wild, sexy, rebellious, and political. (See Complaint paragraph 11). The project also raised awareness to the young people of color and encouraged the children to look up their history .

Neceyx's mission is solely to encourage free thinking and freedom of expression. The body of work that was infringe on was a violation of the [artist's constitution of independence rights](#) (first amendment). The infringement was an attempt to prohibit the plaintiffs freedom to exercise religion, and abridge the artist from her rights to freedom of speech. The [antitrust](#) laws are in place to conduct the organization of business to promote competition and prevent unjustified monopolies. The defendants are in fact operating as a monopoly ,the enterprise is the only supplier of a particular thing (music/movie distribution industry). Their collaboration with other record labels , streaming companies such as instagram, Facebook, Spotify, Apple Music, and all the other companies violates the [SHERMAN ACT OF](#) 1890. The [Clayton act of 1914](#), and the federal trade [commission ACT OF 1914](#). The defendants are a group of independent market participants who collude with each other in order to improve their profits and dominate the market. The defendants created a duopoly by deceitful agreement or secret cooperation between the many companies to limit the competition by deceiving, misleading, and defrauding of their legal rights. The defendants teamed up against the plaintiff because NeceyX is an independent artist capable of loading her own music on all streaming platforms and have done so successfully. Denise Jones (NeceyX) writes her own music, and funds her own studio time, beats, videos and visual works. Neceyx is the sole owner and creator of the Generation X project.

The complaint points to the chain of events that connected the plaintiffs work and defendants work. All the defendants and its organization (cartel) had the opportunity to (view, hear, and copy) the work by dealing through third party publishing and recording companies that had access to the plaintiff's work('s) and the defendants works. These companies included [iTunes](#), [Spotify](#), [Apple Music](#), [YouTube](#) , [tidal](#) (formally owned by [Jay Z](#) the management CEO of Meganthestallion) ,and many more streaming platforms and digital record companies. The plaintiff is registered with [BMI](#) for performing rights and distributed through Distrokid since 2019. (See attachments #2 for contracts for BMI - distrokid proof) Distrokid is a digital music distribution service that musicians use to put music into online record stores and streaming platforms, these platforms include but are not limited to companies such as iTunes, Spotify, Apple Music, YouTube, Tidal, and many many more. Tidal is also a steaming company that was previously owned by the Meganthestallion management ROC NATION (jay z).

July 24, 2019 NeceyX hired [digitaX records CORLEY WHITE](#) to film and edit the video to grab em by the puxxy. The plaintiff had no clue that Corley White and his partner [Joshua](#)



[Heatherington](#) were signed to WHOS HOUSE ENTERTAINMENT ([Jojo Simmons](#)) the son of the founder of Def Jam. The plaintiff did business with the DigitaX records for a few years. NeceyX began working in films with Corley White and Joshua Heatherington. Corley White and Joshua Heatherington are also showcase promoters. They charge artist 50-200 to perform per show. Neceyx paid them to perform in their showcases. (Showcase flyers attached) NeceyX landed the main character in the movie GET LOST starring justina Valentine, fat boy sse, shiggy show and many more. [Watch Get Lost \(2021\) - Free Movies - Tubi](#). The plaintiff had no clue until the movie was aired that CORLEY WHITE took very personal data about the plaintiff and created a movie out of it. These events were all happening at the same time but the plaintiff had no clue all of these people were connected until she investigated them after the infringement. (See attachments photos labeled digital X records)

In December 2019 the plaintiff went to Pittsburgh's number one home for hip hop and R&B, radio station and paid 2,000 for a promotion package. The package introduced NECEYX and the albums Generation X. It played a small clip of the song "[money in hand](#)" and featured NeceyX voice saying "look what y'all made me do y'all got me (IN MY BAG)" a punch line from the song Money In Hand. The promotion aired everyday during the busiest hours morning traffic high volume time slots and evening traffic high volume time slots. \$ 1,500 of the sponsorship packs was to sponsor the [Breakfast Club](#) which at the time was a NATIONAL radio show that's based in New York City Host DJ ENVY, Angela Yee and Charlamagne tha God . Every morning on your way to work and all throughout the day you would hear "the breakfast is sponsored by NECEYX ". It drew immediate attention from the industry because an independent artist was able to get on the radio and sponsor big time radio shows without the highly competitive music industry. (See attachments #3 for radio interview snippets and emails from executives from WAMO Kym Wood, Mike Tomlin, and Portia Foxx also attached are interviews that were posted on Wamo public platforms such as instagram and Facebook) also see paragraph 19 on complaint. .

The plaintiff's work began to be widely disseminated throughout the radio stations in other states and became available all over the world on all streaming platforms such as [iTunes](#), [Spotify](#), [Apple Music](#), [Tidal](#), and basically every streaming platform and record store there is available digitally. ([See attachments for proof 4](#)) The plaintiff was traveling to Charlotte nc every other weekend by plane and automobile, building relationships with industry DJs and A&Rs that are directly attached to the industry. The A&R's job is to find new talent, but they found ways to scam independent artists out of their lyrics and likeness. They now sell the content to the labels and cut out the real content creators. (see attachments for receipts of plane tickets proof of travel#4) I can also produce bank statements at trial that show the states that were visited during the time of album release. Neceyx music was featured in a contest on 104.5 bandwagon radio show (Charlotte NC) for three days and won every day. For the song [Left right Left](#). The music was introduced by the radio personality and DJ KEVIN FOX, real name Kevin Alguas.

Kevin fox plays many roles in the industry; he is the DJ , radio personality on the main station in Charlotte 104.5 , A&R , a showcase promoter and car salesman. Kevin Fox also is an industry spy and scammer that posed as the plaintiffs boyfriend. Dj Kevin Fox worked closely in charlotte with big artists such as [Favio Foriegn](#), [Da Baby](#) and [Megan Thee Stallion](#), benzeno, and many more. During that time Megan J Pete and Da baby collaborated on the song [CRY BABY](#).

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After they were approached about the infringement the executives ordered the artist from their labels to pick apart the rest of NeceyX album so that the plaintiff could appear to be insane and blame every artist for stealing music. The plaintiff just kept heavy documentation to present to the courts. Benzino's daughter Coilerey collaborated with nicki manaj in a song called "[blick](#)"(another slang punch line of [NECEYX song on you ft. Joe beast](#)). Niki Manaj also collaborated with BIA and used more punch lines from the NeceyX album. "And I keep it with me just so that I'm feeling safer" bia , "and "I keep it with me just in case they act a fool". The lines were lifted directly from NeceyX song [RICH CHICK SHIT](#) (" I keep a loaded Glock in case a nigga outta pocket") the artist all are under the same label or sister companies.

The defendants also took the trademark (X) and attached it to merchandise such as [Xfinity](#) X that was featuring MEGANTHESTALLION. The lingerie line was launched in 2018 at the same time they were infringing on all the other art . The CEO of the clothing line is also a part of the [ROC NATION label who is Meganthestallions management](#). The defendants continue to intentionally commit infringement in hopes that the plaintiff would get exhausted and give up. The plaintiff was and still is being cyber attacked by the cartel to cause fear and intimidation and suffering a great deal of emotional distress and humiliation. Some of the artists that were assigned to troll the plaintiff were artists that Denise Jones looked up to all her life so it caused depression and isolation. The plaintiff became so overwhelmed and depressed with the amount of people that were stocking her.

September 2019 DJ Kevin Fox promoted a showcase in Pittsburgh PA, at CLUB 24 in Duquesne of Pittsburgh PA. He had a competition that headlined a super star [Yung LA](#) from Atlanta Georgia. ([Hit song maker if "AINT I"](#)) The showcase promised 5,000 and a chance to perform in New York. After the show DJ Kevin Fox asked to meet up with NECEYX(Denise Jones) to talk about what's next since she won the contest. Denise Jones didn't realize at the time that promoters were running ponzi schemes where they would get 25-50 artists to sign up with a promoter and charge each artist 100\$ dollars to perform in front of a well known artist and 2500-5000 per show cash. Kevin Fox was cornered in by questions regarding the 5,000 and it forces him to tell Denise that the 5,000 have small writing on the flyers that says win 5,000 in videos pictures promo to help push the music. Basically tricking the artist to have to use their label tricking you out of your independence.

The artist never gets the award because that promoter is off to the next city, no contracts signed, no proof. The industry found ways to use major names to go into cities and scam up and coming artists and business owners. If they use a high profile artist all of the up and coming artist will sign up because they want a chance to be seen in front of an artist that already is attached to the industry.

After consistent contact between the two DJ Kevin Fox and Denise Jones begin dating. Kevin Fox drove to Pittsburgh PA, every weekend to visit Denise Jones but Denise Jones became suspicious when she received a phone call that Kevin A. was selling people cars from the city of Pittsburgh asking for a deposit, promising the customers he can make sure they pass a background check to get a car loan without good credit. In particular the club co owner of 24 (where Kevin Fox met NeceyX) Jamal Cambell also known as Bossman chocolate, purchased a BMW for his birthday and Kevin Fox kept saying he would bring it to Boss Man. Denise Jones received multiple calls from BOSS MAN CHOCOLATE notifying the plaintiff that Kevin promised to bring his car to Pittsburgh before his birthday and it was well after his birthday. The plaintiff

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was totally unaware that Kevin Algurs was selling cars to the men in her city and she forced Kevin to give the deposit back to Jamal(Boss Man Chocolate). Denise didn't want any issues with her hometown and KEVIN FOX was now known as the boyfriend of Denise Jones. Jamal called the car lot and spoke to the owner and they fired Kevin Fox and his partner Carlos because the car lot owners contacted everybody that he got credit for selling cars to. The customers all said KEVIN FOX received deposits. Kevin Fox paid the money back to Jamal and the two shortly continued dating. A few other situations occurred that made Denise concerned with Kevin Fox fraudulent behavior made Denise Jones end the relationship with Kevin Fox. The plaintiff has emails , text messages , and cash app receipts as proof.

In section 4 of the complaint it clearly explains in detail the use of a legal business for illegal activities while dealing in an obscene manner. The defendants and their duopoly/cartel gang stocked by using hackers, social media, and internet communication lines. The plaintiff has screenshots and images that can be entered as evidence when the proper time is president. (See attachments #5) for some evidence that they had access to personal information. The industry hires hackers, and pays people in your own city to submit personal information on their target and or murder artist that don't agree to sign contracts.

In paragraph 14/15 in the complaint describes how the industry stocked NeceyX social Media, instagram and Facebook to gather content and information to steal the artist image and likeness. They also gather to use the information as Psychological war. The defendant Jordan Thorpe also wrote for other major artists like [DRAKE](#) and [Kanye](#) West as described in the complaint paragraph 9. These major artists also gang stalked and trolled the plaintiff to cause emotional distress and psychological abuse and threats. (See attachments for evidence #6)

Section 6 of the complaint states that the song writer Pardison Fontaine (Jordan Thorpe) songwriter /creator for both songs WAP and Thot Shit is also the public industry boyfriend of Meganthestallion real name Megan J Pete. The plaintiff operated an independent living company with Jordan Thorpe's Father Mathew Jerry Thorpe in 2018. The partnership ended with the result of Jorden Thorpe's relatives Mathview Thorpe and Denise Jones in court rulings favored Denise Jones. The plaintiff had no clue at the time that level of power the Thorpe's family held until they began to use their power to stock and harass Denise Jones. [Megan also posted an article](#) about her opening the same kind of business to troll the plaintiff.

After Denise Jones had all the evidence gathered to prove the infringement Denise Jones began investigating all the people she came across and revisited her timeline.

February 2016 Denise Jones went to Vegas with her Aunt from California Deborah Torres and met a group of managers and artists that were collaborating with [Lil Boosie](#). The manager's name was Donell Wondfield from Louisiana. He was with another manager from Chicago named MARK. The managers were at a hip hop award show in Vegas with Levi who collaborated on the album ([GOD GOT ME](#)) ft . Lil Boossie. (See attachments# 6). Neceyx kept in contact with Donell Winfield as a valuable connection to the industry. NeceyX had not at that time figured out how to put her music on display for the public. It was still early in her career. Months later NeceyX received a call from Donnell asking if NeceyX could look out for his friend [Crystal Woodford](#) while she's in Pittsburgh. Neceyx said no problem not understanding that Crystal Woodford was assigned to be her handler for the industry. Her job title is head hair stylist in the Film INDUSTRY UNION. (see attachments#7) ... Denise would like the chance to present all the evidence of the grooming that took place during the time that Crystal Woodford

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was in contact with NeceyX. During their (arranged friendship) Crystal Woodford introduced NeceyX to many people connected to the music and film industry. Crystal Woodford are close friends with Nolimit member mystical who is now imprisoned for rape allegations. Crystal Woodford took all of the information she had about Denise Jones about being falsely imprisoned for her activism in Pittsburgh Pennsylvania and made a short film out of it without the permission of Denise Jones, ([see attachments](#)) and withheld footage and photo images back to delay the promotion of the album.

The INDUSTRY will send all of their members to gang stalk you disguised as opportunities and relationships. While in contact with DJ Kevin Fox , Denise also made many connections from being on the music scene with him. She came in contact with DJ Shonuff (Angelo Goldston) ; he is a former Dj for NoLimit (master p) label. He also films music videos and photos. DJ Shonuff and Dj Kevin Fox gave the defendants photos of Denise Jones to use as blackmail that they took while in the private company of Denise Jones. The pictures were not provocative enough to destroy the image of Denise Jones but were used as revenge porn as an intimidation tactic. The cartel used the photos in Memes and posted on instagram and facebook to the public. The plaintiffs did that in order to scare the plaintiff into not following up with the lawsuit. The photos covered up the face of [NeceyX](#) so only she knew it was her, but it was enough to threaten her as black mail. Neceyx still continued with the lawsuit. They used Drake the number one artist who also uses Pardison Fontaine as his ghost writer to troll and humiliate NeceyX by gathering information to display on the ([shade room](#)) to cause anxiety, and grief, and harass Ms. Jones.

In June 2021, [Thot shit](#) was released and all the lyrics 14 lyrics and the entire video was directly lifted from the [grab 'em by the puxxy](#) video produced and written by Denise Jones artist name NECEYX. At that moment a PFA was placed on Mathview Jerry Thorpe. At that moment NeceyX became aware that she was targeted and under attack for a very long time. That's when the plaintiff was able to put all the missing pieces together. When you're initially being stocked and hazed you don't understand exactly what's going on until it's almost too late. (See attachments#8) for proof of relationship to Mathview Jerry Thorpe and the THORPE FAMILY.)

The similarity between the plaintiff's work and the defendants work is so striking that it is almost impossible that the works were not created independently of one another. Paragraph 15 of the complaint describes how in the song THOT SHIT there are 14 different lines copy and pasted from five different songs. The plaintiff's works were produced and created solely by the artist NeceyX. The defendants neither write or produce their own music. There is a big creative team to help create concepts and imagery (see attachments for the video trailer if GTP, and the lyrics that were infringed upon.) it is a rebuttable presumption that the infringement was committed willfully for the purpose of determining relief. The violators

So with all due respect I'm asking that the courts respectfully deny the defendants motion to dismiss the case and allow the plaintiff to either continue filing for default judgment or allow the plaintiff to present the case in front of a jury as request for jury trial was entered with the complaint.

The plaintiff would respectfully like to address the motion for default requested by the plaintiff and ask the courts to carefully go over the details and allow the plaintiff to complete the default process request.

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June 2021 the defendant's were approached by the plaintiff by email through social media and other ways of contact, to notify the defendants of infringement. (See attachments #9) The plaintiff spent a lot of time trying to obtain an attorney . Many attorneys in copyright infringement said it would be a conflict of interest. Many of the attorneys were already attached to the music industry and its major executives.

Denise Jones made contact with a lawyer from Texas named Mark Graham. The attorney delayed the process of filing the complaint until after October 2021, after NeceyX Movie GET LOST was due to be released. Mark Graham was trying to get NeceyX to agree to forget about what happened and agree to sign a contract to act as a ghostwriter for the defendants. Neceyx told Mark Graham, her attorney, that she wanted compensation for the infringement before she agreed to collaborate. After that attorney gathered all the information off of Denise Jones he started going missing saying he was locked in a rehab for attorneys and other excuses (see attachments #10). Denise Jones received a call from an accomplice of Mark Graham or someone posing as his associate that encouraged NeceyX to call the bar association to find out the status of Mark Graham and was notified that he was inactive until Jan 2022.(see attachments 11) The entire time Neceyx was communicating with her attorney he was not authorized to even act as a legal representative of the courts. Many artists are bamboozled by attorneys that the industry sends as spies.

February 1,2022 the plaintiff Denise Jones filed a complaint PRO-SE Against Atlantic Records, Warner Music Group, 1501 Certified Entertainment, 300 Entertainment, the CEO's etc.. The complaint clearly states: criminal infringement by violating the exclusive copyrights

February 2, 2022 the complaint docket was hand delivered to the United States Marshals New York ECF no. 10. filed. When the clerks filed the complaint the docket got double stamped at the top that caused a tiny distortion of the date filed. The complaints for 1501 Certified Entertainment and CEO Carl Crawford had to be served in Texas. Deputy Gonzalas was assigned to the complaint.

February 4, 2022 the plaintiff applied for a IFP, a motion to obtain free council. The lawyer that assisted the plaintiff from June 2021 until December 2021 was sent through the industry . After the lawyer failed to meet deadlines to file the complaint the plaintiff called into the BAR ASSOCIATION to see if the attorney was in good standing and the Bar association notified the plaintiff that the attorney was just reinstated that week. That means that the attorney was practicing Law and negotiating without legally available to practice law. (See attachments#12 proof) and there's more details that can be presented in court with emails and phone conversations when the proper time is presented to the plaintiff during trial or when asked from the courts.

February 22,2022 the plaintiff filed a motion to identify infringers address of Megan J Pete, Jorden Thorpe and Belcalis Almanzar ECF NO. 13 filed February 24,2022 . Docket ECF no 12 alerted the courts of anxiety,grief, and fear. Denise Jones moved her place of residence to protect her safety .

During this time the industry, Da baby was using decrypted [subliminals](#) that they would [green light \(kill\)](#) the plaintiffs uncle Peter Torres. After the plaintiff approached the industry JUNE 2021 employees her uncle Peter Torres was imprisoned for murder and sent intentional attacks (hospitalized in prison) while going through trial. He's a resident of Hollywood. Peter Torres was sent to the hospital. After the complaint was sent to the UNITED STATES

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MARSHALS OFFICE 2/22/2022, the plaintiffs uncle Peter Torres was released from prison two days later. At this time Denise Jones became aware that her family was being targeted. The mother of the plaintiff's home was vandalized repeatedly in the middle of the night, police reports were filed and video images and videos were documented. EFC NO. 14 the plaintiff sent a letter to the courts to ask if they could keep the address confidential. April 7, 2022 the judge ruled confidential requests granted. During the thirty days the plaintiff waited, the defendants sent a letter directly to the plaintiffs home from the ct corporation, stating that they don't accept complaints even though the clerk already accepted it and signed it. They sent the letter to instill fear. The plaintiff notified courts of the letter.

April 7th the plaintiff flew out to Hollywood to visit her uncle Peter Torres to talk to him about the music industry. The very next month Peter Torres was found dead on his kitchen floor. The Funeral live streamed ([See attachments for evidence .#13](#))

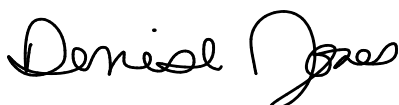
5/5/2022 The US Marshals deputy Gonzalas served Atlantic Records, Warner Music Group , 300 Entertainment, Kevin Liles, Craig Kaleman, and Stephen Cooper. Note: the plaintiff filed pro-se and solely depends on the courts to serve. The plaintiff was in very close contact with Deputy Gonzales and he can witness the attempts to delay the serving process. Deputy Gonzalez probably served all defendants properly and timely fashion.

1501 Certified Entertainment and CEO complaints had to be transferred to TEXAS jurisdiction. (See EFC 17,18,19,29,21,22) the defendants had until 5/26/2022 to respond to the complaints. The complaints for 300 Entertainment and Kevin Liles were served to Ms Higgins . The clerk Vincenza Cipriano was properly served for Atlantic Records, Warner Music Group, and 300 Entertainment.

5/26/2022 The defendants attempted again to delay and inconvenience the courts. Instead of answering the complaint the defendants requested a pre-motion trial conference for a request to leave. In the responses the defendants made false statements that they have not been properly served. It was already established that they were. (see ECF NO 17,18,19,20,21,and 22.)

5/31/2022 plaintiff responded by sending a letter to the courts asking the judge to deny the request. 6/21/2022 the courts extended the deadline for service on 1501 Certified Entertainment and CEO Carl Crawford for 90 days and suspended the time to respond to the complaints during that time. The courts also ordered the defendants to respond to EFC 27 by 6/27/2022. 6/17/22 the plaintiff requested an injunction ECF NO 27. 6/21/2022 EFC 28 & 29 the courts extended the deadline for service on 1501 Certified Entertainment/CEO Carl Crawford. The order for the defendants to respond was suspended for 90 days . 6/27/22 the defendants except 1501 responded but only by asking for a motion to dismiss. 6/27/2022 The plaintiff Denise Jones filed for default judgment. 6/29/2022 the courts denied the plaintiffs motion for default judgment without prejudice due to 1501 Certificate Entertainment not yet being served in TEXAS.

6/30/22 1501 Certified Entertainment was served by US MARSHALS DEPUTY HERNENDEZ by serving CEO Carl Crawford. Mr Carl Crawford had 21 days to respond to the complaint. 7/21/2022 all defendants time to respond exceeded. The plaintiff waited an extra eight days to give them a chance to respond. 7/28/2022 EFC #38 The plaintiff notified the courts that everyone was served and asked the courts to take action against the defendants. 7/29/2022 EFC NO. #39 The courts responded by endorsement: if 1501 Certified Entertainment have been served and if their time to answer has elapsed, the plaintiff may seek a clerk's

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certificate of default judgment. 8/1/2022 The U.S. Marshalls processed a receipt and return of service executed summons and complaint service on 6/30/2022. The service was accepted and the answer back due date stamped 7/21/2022. 8/3/2022 -8/2/2022 the attempted certificates of default were entered into the system. Aug 5,2022 the plaintiff made a second attempt to notify the courts of threatening letters and the demanding a withdrawal in a passive aggressive manner. On that same day the plaintiff Mr. Carl Crawford committed perjury by blankly lying to the courts stating on 8/5/2022 that he just learned "that day" (after default certificates get entered into the system) that 1501 Certified have been served. The plaintiff immediately made contact with all three of the US Marshals including the head supervisor in TEXAS, to find out exactly who had been served at 1501 Certified Entertainment. The plaintiff immediately notified the courts of the perjury and notified the courts multiple times of the consolidated M&A of 1501 Certified Entertainment and other defendants. EFC 66 . The courts gave Mr. Crawford until August 18th 2022, and stated the default request stayed pending. 8/15/2022 the plaintiff sent a letter to the courts respectfully requesting that the extension be revoked and entered an amended 385 from the US Marshals offices EFC. No. 69 on 8/17/2022, stating that Mr. Carl Crawford was indeed personally served. 8/17/2022 after the amended 385 was entered Carl Crawford again notified the courts that he needed more time even after his deadline was 8/18/2022 to obtain counsel. He notified the courts of his "anticipation" of joining the other defendants by requesting a pre-motion requesting to dismiss. 8/19/2022 EFC. 83 re entered the amended 385.

The judge never responded to the letter Mr. Crawford sent on 8/17/2022.

The plaintiff waited 32 days before re-entering a request for a certificate of default. Even after many attempts to notify the courts of threats and fear, the plaintiff sibling was murdered at the [gas station 9/9/2022](#). A man pulled up to him sitting pumping gas and opened fire murdering him cold blood. Even after the tragic event the plaintiff still managed to gather herself enough to continue to file the request for default judgment. During the whole time the plaintiff waited to present her case in court the defendants and its cartel continued to stock and harass the plaintiff. The main artist that committed the infringement Megan J Pete aka Meganthestallion used her instagram and Facebook accounts to mock the death of the plaintiffs brother (see attachments #14) decrypted language the industry uses to send fear to any competitors. As spoken of in the original complaint the song writer Pardison Fontaine aka Jorden Thorpe also writes songs for artists such as Kanye West and Drake and used both artist and their platforms to taunt, harass, stock, and the plaintiff. They used hackers to find very sentimental and valuable information on the plaintiff and the cartel began to use the information as a scare tactic. (See attachments#14a)

They are all connected. It's a mob. [Meganthestallion is signed by Carl Crawford](#) stationed in Houston Texas. [Carl Crawford associates with J Prince](#) who has an organization by the name of MOB TIES. J Prince has a son named Jas Prince who discovered Drake. All stationed in Houston Texas. This history is important because there are small companies being run by the larger companies. You will never know exactly who is in charge if you don't know the history of the music culture.

The plaintiff is respectfully asking the courts to strongly consider the multiple extension and the continued disregard and disrespect for the courts time to continue to delay the process.

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9/21/2022 the plaintiff correctly filled out the certificates of default and all certificates were signed. There are eight defendants and every certificate of default had to be filed separately. That's why there appeared to be many deposits.

9/26/2022 the defendants requested to vacate for erroneous default

9/29/2022 etc. 117 request for injunction

10/4/2022 all certificates of default were signed and completed. The plaintiff is respectfully asking the courts to allow her to proceed with the default process.

The first time that the eight certificates of default were filed the (pro-Se) plaintiff was not familiar with the language "the date commenced on" and mistakenly entered 2/22/22. February 22, 2022 was the date the courts submitted the complaints to the US MARSHALS office of New York Deputy Gonzalas. The plaintiff contacted the pro-Se clerk and was directed to the law advice extension. They clarified the date commenced on was in reference to the date filed. Also the date field was hard to see because the date was double stamped when it was entered and there were two sets of 2's. 2/2/22 double stamped (see attachments#15) Once the commenced date was established the certificate of default was entered properly and signed by the clerks.

The courts gave the defendants until November 1, 2022 to file their motions to dismiss and the courts notified Mr Crawford his organization can not file pro-Se and his council had until November 1, 2022 to file an appearance. The plaintiff is respectfully asking the courts to disqualify any additional request or notice entered by defendants after November 1, 2022. The plaintiff is respectfully asking the courts to deny all defendants motions to leave and allow the plaintiff to either continue the default process or allow the plaintiff to present her case in court in front of a jury as requested at the time the complaint was commenced.

Evidence : warning inappropriate language and content ahead apologies.

After the plaintiff was absolutely positive that her art was being infringed upon, she looked at all the music side by side with the dates and realized that she had been stocked her entire career. Every song NeceyX released and performed, Meganthestallion song writers would steal content from NeceyX and apply it to Meganthestallion and Cardi B. The artist that is signed to a record label is not allowed to release anything without the permission of the record label so the labels constructed the black ball. The music executives launched a black ball on Denise Jones because the music was positive and had a message that counteracted the image that the labels wanted the industry to promote. The record label made many attempts with other artists to sabotage the career of NeceyX . They mocked her style of music because it is intellectual. It did not fit the agenda that the industry pushes.

#1)

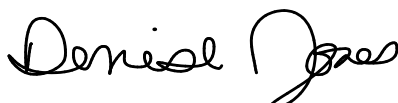
1/8/2020 NeceyX(bag) "why she so savage bytch they had me gated in northview " (see attachment #16)

[3/6/2020 meg/b "I'm a savage"](#) ratchet Bouji bad

Ft Beyoncé the wife of (Meagan the Stallion) manager Jay Z from roc nation.

#2)

2/10/19 F THE POLICE (boys in the hood remix)NeceyX (see attachment #17))



[6/26/2020 meg \(girls the hood remix\)](#)

#3 Aug 30,2019 BAG SONG Necey X (also attachment 17)

- I'm a vet with this shit all I know is eating dinner
- from east or west coast all the bosses fuck with me

October 2,2020 ([don't stop](#))MEG

- Real niggas love me from the H to the D

#4)

[Rich chick shit by NeceyX 7/1/2020](#)

Either sign the disclosure or do not get in the party , killers all around me man I'm not just anybody

Body .. body body

[Body 11/20/2020 meg body ody ody ody](#)

Rule number 1 if we link up on a real sneak tip rule number 1 don't you repeat that shhhh

#5)

[money in hand NeceyX 1/1/2020](#)

"Don't make me get in my bag"

I get straight to the bag put the money in my hand . Every time I make the right they wanna bang the left

Meg I be in my bag but I be in his beg too

6# [Left right](#) left NeceyX recorded Dj Kevin fox put on air 9/2018

Simon says by Meg 5/17/2019

Left right left right left

THEY TOOK A BREAK THEN

NeceyX the released

[Own money ft. young la 8/12/2020](#)

[Rich chick shit 7/1/2020](#)

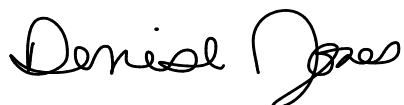
[On you ft Joe beast 7/16/2020](#)

[Grab em by the puxxy 1/8/2020](#) and video trailer released

[WAP 8/25/2020](#)

[Thot shit June 11,2021](#)

Number#7)

• 

NeceyX: Got a little whiskey and I'm talking M Lewinsky

Meg: •when the liquor hit a bytch get toxic
• drinking out the mtf bottle on my Thot Shit

*{ in Thot shit video girls pouring drinks on the senator with the women with blue M Lewinsky shirts} the shirts also have blue stripes representing prison. (Reference) [GBTP SONG](#)

#8) puxxy so wet got that ni@@a wildin
Puxxy so wet got that ni@@a wildin (WAP)
{grab em by the puxxy}

Meg: why you in the club with them ni@@as wildin ([Thot shit](#))

#9) NeceyX: no missionary ni@@a hit it doggy style {grab em by the puxxy}

Meg: missionary or doggy style, ima top sh\$t
(Thot shit)

#10) NeceyX rich chick shhh 7/1/2020 [Neceyx | Spotify](#)
Ni@@a I'm the sh&t , don't give a f who talk about me

Meg Thot shit June 2021
Don't give a f who talk behind my back , I don't gaf about a broad tryna bash me ,I'm the shit
(per record academy)

#11) grab em by the puxxy NECEYX 1/8/2020 <https://distrokid.com/hyperfollow/neceyx/grab-em-by-the-pussy-2>
"Don't come approaching unless you coming talking about them thousands "

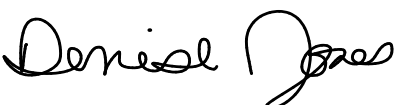
Meg Thot shit 2021
"We ain't even speaking of a ni@@a ain't spending"

#12) on you ft Joe beast 7/16/2020 [On You](#)
<https://open.spotify.com/album/5Oivv0KD7z32NhnfjZOaxT>

Joe beats " vvs all on my necklace ni@@a what's on you "

Meg Thot shit 2021
"Love it when a nigga got a mouth full of vvs " my chain ain't hitting if a bitch ain't hurting lol

#13)
NeceyX BAG AUG 2019

• 

"Ima vet with this shit all I know is eating dinner"

Meg Thot shit 2021

Ima snake I got a lot of venom, since these hoes all rat all I see is a whole lotta dinner

#14) rich chick shit Neceyx 7/1/2020 [Rich Chicks Shit https://g.co/kgs/FctDHv](https://g.co/kgs/FctDHv)

"I'm a bossy ass chick I like that sloppy toppie you can just give me some head I ain't tryna catch a body ody

Meg Thot shit 2021

"Booked but I squeeze a little head in my calendar "

Now WAP WAP WAP 8/25/2020

[#15\) NeceyX grab em by the puxxy 1/8/2020](#)

I could make him eat it while he do donuts when it's time for court nobody show up

Cardi: put this puxxy in ya face swipe ya nose like a credit card

Hop on top I wanna ride /

Meg : your honor ima freak bitch hand cuffs leashes

These are just the obvious pieces of evidence. The plaintiff have the whole entire timeline, pictures, emails, plane receipts, and names of all the individuals she did business with along with the record labels. Quality Control music (the record label of the husband of Cardi B) tried to reach out to the plaintiff in 2019 and mishandled the agreement so the relationship was tarnished. Please see attachments to evidence!! (Attachments #17)

The music industry is run like a cartel. The plaintiff and her love ones are in danger and have been the entire time the plaintiff is respectfully asking the courts to consider all of this very detailed information before making the decision.

Here is a list of people from the industry that were in direct contact with NeceyX and the defendants to add to the list of events that took place leading up to the infringement.

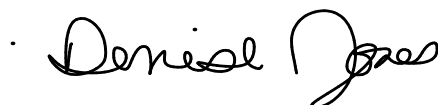
Quality Control A&R Lamar Sanders ~Apri 29,2019 (connected to Cardi B)

Dj Kevin Fox aka Kevin Alguras Jun 19,2014

(Connected to Meganthestallion, Da Baby, Fabio F., and young blue.) {Charlette NC}

Crystal Woodford lead industry hair stylist and music manager, film producer {Louisiana}
connected to the entire industry

Donnell Wondfield 3/15/2016 music manager {Louisiana } connected to lil boossie



James Webb engineer (plug media) Pittsburgh Pa
James S. white film producer (plug media) Pittsburgh PA

Boss man chocolate Aka Jamal club promoter and stripper manager

Wamo radio show ~ Kym Wood executive , Portia Fox radio personality, Mike Tomlin engineer,
Nigel,
(Work consistently with crew)

Corley White (Digital X records) and many more !!

THE BREAKFAST CLUB #1 radio show in the country. The plaintiff paid a thousand dollar
sponsorship

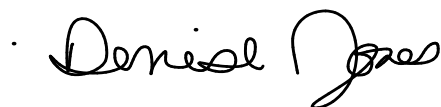
The plaintiff would file a subpoena for them to appear in court at the time presented and also
add some of these participants to the lawsuit.

Laws
Copyright Law of the United States title 17 chapter 5

The constitution (first amendment)

The anti-trust Laws
Please take note that the plaintiff is pro-Se and is not an attorney but deserves the equal rights
to be able to defend herself in the court of Law.

Respectfully, Denise Jones

A handwritten signature in black ink that reads "Denise Jones". The signature is written in a cursive, flowing style with a large initial 'D' and 'J'.